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2. It was a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by a United States person, and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b), in violation of Title 21, United States Code, Section 1904(c)(1), and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.

3. It was further a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by a United States person, and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act, in violation of Title 21, United States Code, Section 1904(c)(2), and Title 31, Code of Federal Regulations, Section 598.204.

4. It was further a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by one or more United States persons who

were officers, directors, and agents of an entity -- to wit, an agent of American Charter Services LLC and an agent of SVMII Solution LLC -- and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b), in violation of Title 21, United States Code, Sections 1904(c)(1) and 1906(a)(2), and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.

5. It was further a part and an object of the conspiracy that MICHOLS ORSINI QUINTERO, the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, an agent of American Charter Services LLC and an agent of SVMII Solution LLC -- and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act, in violation of Title 21, United States Code, Sections 1904(c)(2) and 1906(a)(2), and Title 31, Code of Federal Regulations, Section 598.204.

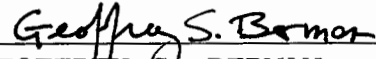
Overt Act

6. In furtherance of the conspiracy and to effect the illegal objects thereof, MICHOLS ORSINI QUINTERO, the defendant, committed the following overt act, among others:

a. In or about April 2018, ORSINI QUINTERO transported a Specially Designated Narcotics Trafficker designated pursuant to the Foreign Narcotics Kingpin Designation Act.

(Title 21, United States Code, Sections 1904(c)(1)-(2) and 1906(a)(1)-(2); Title 18, United States Code, Section 3238; Title 31, Code of Federal Regulations, Sections 598.203(a), 598.204, and 598.406.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MICHOLS ORSINI QUINTERO,

Defendant.

SUPERSEDING INDICTMENT

(21 U.S.C. §§ 1904, 1906; and
18 U.S.C. § 3238.)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL

Donald Eldred Marx

Foreperson.

2/11/19

AD Subst Fed A/N valed

Mr. DeLoe